

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HOP HOP PRODUCTIONS, INC., and
FALEENA HOPKINS,

Plaintiffs,

-against-

KEVIN KNEUPPER, TARA CRESCENT, and
JENNIFER WATSON,

Defendants.

Civ. Action No. 1:18-CV-04670-AKH

Filed by ECF

DECLARATON OF LAUREN BETH EMERSON

I, Lauren Beth Emerson, do hereby declare as follows:

1. I am an attorney with the law firm Leason Ellis LLP, counsel of record for Defendant Kevin Kneupper. I submit this declaration in support of Defendants' Joint Memorandum of Law in Opposition to Plaintiffs' Order to Show Cause for Preliminary Injunction and Temporary Restraining Order in the above-captioned proceeding.
2. I have personal knowledge of the facts and circumstances set forth in this declaration and can competently testify thereto in a court of law.
3. Attached hereto as Exhibit A is a true and correct printout from Goodreads.com.
4. Attached hereto as Exhibit B is a true and correct printout from Goodreads.com.
5. Attached hereto as Exhibit C are true and correct printouts from Amazon.com.
6. Attached hereto as Exhibit D are true and correct printouts from Goodreads.com.
7. Attached hereto as Exhibit E is a true and correct printout from Goodreads.com.

8. Attached hereto as Exhibit F are true and correct printouts from NYTimes.com.
9. Attached hereto as Exhibit G are true and correct printouts from Goodreads.com.
10. Attached hereto as Exhibit H is a true and correct printout from Twitter.com.
11. Attached hereto as Exhibit I is a true and correct printout from Twitter.com.
12. Attached hereto as Exhibit J are true and correct printouts from cassiesharpbooks.wordpress.com, Twitter.com, and YouTube.com.
13. Attached hereto as Exhibit K is a true and correct printout from TTABVUE showing the status of Cancellation Proceeding No. 92068527 as of May 31, 2018.
14. Attached hereto as Exhibit L is a true and correct download from USAToday.com of the Best-Selling Books Top 150 list through Sunday, 5/27/2018.
15. I have personally reviewed portions of the *Cocktales* anthology. Many of the stories including in the anthology appear to feature a “cocky” or arrogant protagonist. The term “cocky” is used throughout the book. In addition to the stories, the book includes a forward by author Nana Malone who describes, without naming names, how Plaintiffs’ enforcement of her purported “cocky” marks impacted her.

Pursuant to 28 U.S.C. § 1746, I, Lauren Beth Emerson, further declare under penalty of perjury that all statements made herein based on my own personal knowledge are true and that all statements made on information and belief are believed to be true.



Date: May 31, 2018

Lauren Beth Emerson